

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

**U.S. Bank Trust National Association, not
in its individual capacity, but solely as
trustee of Citigroup Mortgage Loan Trust
2019-E**

Plaintiff

vs.

**Warren G. Cousins, Jr. and
Kristi Cousins**

Defendants

**LVNV Funding, LLC
U.S. Bank National Association, Not in its
individual capacity, but solely as Trustee of
NRZ Recovery Trust
Helen Cousins**

Parties-in-Interest

CIVIL ACTION NO: 2:22-cv-00323-JAW

**MOTION TO STAY AND REFER TO
STATE OF MAINE FORECLOSURE
DIVERSION PROGRAM**

RE: 317 Tatnic Road, Wells, ME 04090

**Mortgage:
October 19, 2006
Book 14988, Page 0146**

NOW COMES the Plaintiff, U.S. Bank Trust National Association, not in its individual capacity, but solely as trustee of Citigroup Mortgage Loan Trust 2019-E, by and through undersigned counsel, and hereby requests that this Honorable Court enter an Order staying this case and referring this matter to the State of Maine Foreclosure Diversion Program. As grounds therefore, undersigned counsel for Plaintiff states that John Z. Steed, Esq. has advised he represents the Defendants, Warren G. Cousins, Jr. and Kristi Cousins, and that he intends to file a Notice of Appearance for the Defendants. Although the parties were previously engaged in settlement via trial modification, it appears that has not been successful, and the parties would like to attend mediation to explore alternative settlement options. John Z. Steed, Esq., as attorney for the Defendants, consents to the filing of this Motion to Stay and Refer to the State of Maine Foreclosure Diversion Program.

WHEREFORE, based on the foregoing, Plaintiff respectfully requests that this matter be stayed in its entirety, and referred to the State of Maine Foreclosure Diversion Program to allow the parties the opportunity to explore potential settlement options for the subject loan.

DATED: March 22, 2023

/s/ Reneau J. Longoria, Esq.
Reneau J. Longoria, Esq., Bar No. 5746
Attorney for Plaintiff
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CERTIFICATE OF SERVICE

I, Reneau J. Longoria, Esq., hereby certify that on this 22nd day of March 2023, I served a copy of the above document by electronic notification using the CM/ECF system and/or First Class Mail to the following:

/s/ Reneau J. Longoria, Esq.
Reneau J. Longoria, Esq., Bar No. 5746

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Kristi Cousins
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Augusta, ME 04330

U.S. Bank National Association, Not on its individual capacity, but solely as Trustee of NRZ
Recovery Trust
75 Beattie Place, Suite 300
Greenville, SC 29601

Helen Cousins
P.O. Box 426
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